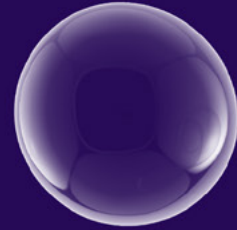




# Modern Slavery Transparency Statement

2022



# Preface



**By Patrick Rowe**

Chief Compliance Officer

Our purpose at Accenture—to deliver on the promise of technology and human ingenuity—has never mattered more. By combining human ingenuity and the power of technology we can drive positive impact and create a fairer, more sustainable world.

Our strategy is to deliver 360° Value in everything we do and for everyone we work with. By acting across a spectrum of environmental, social and governance (ESG) priorities, including those focused on human rights—and by helping all our stakeholders do the same—we contribute to the creation of a more sustainable world for all. As a signatory to the United Nations Global Compact (UNGC) since 2008, we maintain a long-standing commitment to respecting human rights in our business operations and our supply chains.

We foster an environment where respect for the individual and their rights is at the heart of how we operate. We also recognise that our clients and other stakeholders increasingly look to us for visibility into our human rights practices and policies. Guided by our core values and as stated in our Code of Business Ethics, we seek to align to the United Nations (UN) Guiding Principles on Business and Human Rights, and we also adhere to relevant international instruments and documents.

We will continue to bring these values and commitments to life in our own business to support the elimination of modern slavery.<sup>1</sup> Recognising there is significant alignment between the actions we have taken in relation to our United Kingdom and Australian supply chains (as well as other steps we have taken around the world), this year we are publishing our first joint statement for the United Kingdom and for Australia.

Given the nature of our business and supply chains, and the risk assessments we have undertaken to date, we believe the risk of modern slavery in our supply chains is low. But we are not complacent and frequently review how we can improve and evolve in response to changing circumstances and the evolution of our business.

This year's Modern Slavery Transparency Statement includes information on:

- Our new Sustainable Procurement Hub.
- Our enhanced supplier audit process.
- Our upcoming conflict minerals reporting.
- Highlights about the work of Accenture's Global Human Trafficking Community of Practice, in particular the recently launched OnWatch™ training.

We believe that transparency builds trust and helps us make more progress. It is in this context that we publish this Modern Slavery Transparency Statement.

A handwritten signature in black ink that reads "Patrick Rowe". The signature is fluid and cursive, written in a professional style.

**Patrick Rowe**

Chief Compliance Officer

1. In this statement, references to 'modern slavery' include trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and harmful child labour.

## Accenture's business

Accenture is a global professional services company with leading capabilities in digital, cloud and security. Combining unmatched experience and specialised skills across more than 40 industries, we offer Strategy and Consulting, Interactive, Technology and Operations services—all powered by the world's largest network of Advanced Technology and Intelligent Operations centres. Our more than 674,000 people deliver on the promise of technology and human ingenuity every day, serving clients in more than 120 countries. We embrace the power of change to create value and shared success for our clients, people, shareholders, partners and communities.

Accenture UK<sup>2</sup> has over 14,000 employees in the United Kingdom and offices in Birmingham, Edinburgh, Leeds, London, Manchester and Newcastle.

Accenture Australia<sup>3</sup> has over 7,000 employees in Australia and offices in Adelaide, Brisbane, Canberra, Melbourne, Perth and Sydney.

## Our commitment to human rights and sustainability

Our commitment to supporting and respecting internationally proclaimed human rights is a common thread throughout our business, requiring the support of our leaders, our people and our suppliers. The UN Sustainable Development Goals (SDGs) provide powerful guidance to us for partnering with all our stakeholders for good—by championing the SDGs with a focus on those that are most relevant for our company, we galvanise and support our clients, our ecosystem partners, suppliers and other stakeholders on their SDG journeys.

### High priority SDGs for Accenture's operations:




Accenture has always been committed to doing business responsibly, ethically and legally, and that has been the foundation for the company's global culture espoused by all its people.

Accenture's culture is shaped by our core values, and our core value of 'Respect for the Individual' underpins our commitment to the elimination of modern slavery. We expect all our people to treat each

2. In this statement, references to 'Accenture UK' mean Accenture (UK) Limited (registered number 4757301), registered in England and Wales with registered address at 30 Fenchurch Street, London EC3M 3BD, England, and Karmarama Limited (registered number 03495324) registered in England and Wales with registered address at 30 Fenchurch Street, London EC3M 3BD, England.

3. In this statement, references to 'Accenture Australia' mean Accenture Australia Pty Ltd ABN 49 096 776 895 and Accenture Australia Holdings Pty Ltd ABN 61 096 995 649, with their registered offices at 3 Sussex Street Barangaroo, Sydney, NSW 2000, and all their Australian subsidiaries.



other, and those we deal with, respectfully and with dignity. We do not tolerate physical violence, threats, corporal punishment, mental coercion, verbal abuse, disrespectful behaviour, bullying or harassment of any kind.

We strongly encourage our people to raise concerns to a manager or trusted advisor, an Accenture leader, Human Resources or Legal, and we make it clear that they can always escalate concerns without fear of retaliation. Concerns may also be reported anonymously 24/7 to the [Accenture Business Ethics Helpline](#). We encourage our people to contact Human Resources or Legal for guidance if they are unsure whether an issue should be reported. We take all good faith concerns seriously and take all steps necessary to help ensure that those who raise concerns do not experience any form of retaliation. We have also extended this approach to our charity partners in the United Kingdom. See our [Global Policy on Speaking Up and Zero Tolerance for Retaliation](#).

We have a [Global Policy on Prohibition of Human Trafficking, Forced Labor and Child Labor](#) expressly prohibiting our employees from engaging in or supporting human trafficking, forced labour and harmful child labour in connection with Accenture's activities, including in our supply chains. In fiscal 2021, we adopted a new [Global Policy on Responsible Mineral Sourcing](#) to reflect the evolving nature of our business and in support of our growing Industry X practice.

Our [Code of Business Ethics](#) (COBE) applies to all Accenture employees around the world and provides a framework within which our people make responsible behaviour a natural part of what we do every day—with each other, our clients and business partners, and our communities where we work and live. COBE highlights our support and respect for human rights, which includes helping to eliminate modern slavery. Accenture investigates any potential human rights breach it becomes aware of and seeks to appropriately remedy or mitigate those breaches. If it is unclear how to apply the law consistent with our human rights principles, we are guided by our core values and COBE to support and respect the principles of internationally recognised human rights.

Our approach is consistent around the world. Collaboration across our One Global Network is fundamental to how we drive innovation and deliver value for our clients. As part of this collaboration, Accenture group companies receive services from other companies within the Accenture global group. These companies adhere to our core values, our COBE and our global policies. We continue to review and assess our own employment practices as part of our wider risk management processes, and consistent with our commitments under the UN Guiding Principles.

We continue to review our employee retention practices across our global group of companies. This follows from similar reviews in previous years, and we remain committed to take appropriate action if we identify concerns.

## Our Supplier Standards of Conduct

More broadly, the relationship between Accenture and our Accenture suppliers<sup>4</sup> is a critical component of our support for human rights. Consistent with Accenture's standard procurement process, we require all Accenture suppliers to comply with our global [Supplier Standards of Conduct](#) or to make an equivalent commitment.

Our Supplier Standards of Conduct reflect our core values, our ethical principles and our commitment to human rights. They set out clearly the labour standards that Accenture suppliers must adhere to, particularly in relation to modern slavery.

In fiscal 2021, we amended our Supplier Standards of Conduct in response to our growing Industry X practice to include a specific provision on the responsible sourcing of minerals.

We seek to encourage a culture of transparency within our supply chains and provide a mechanism to enable employees of Accenture suppliers to speak up about legal or ethical concerns, including modern slavery. Employees of Accenture suppliers may report concerns or violations (anonymously where permitted by local law) through the [Accenture Business Ethics Helpline](#). To date, we have not received through this Helpline, or otherwise, any complaints from third parties raising concerns about modern slavery.

## Accenture's supply chains

Accenture UK and Accenture Australia both have multi-million-pound/dollar supply chains respectively and bought goods and services from approximately 2,000 suppliers in the UK and approximately 700 in Australia during fiscal 2021.

For Accenture UK, about 91% of this spend is with companies that have a presence in the United Kingdom, and the top three categories of Accenture UK's procurement spend (accounting for just over 70% of our UK spend) comprise:

- Contractors (including the use of contingent labour and other service providers),
- Technology, and
- HR services.

For Accenture Australia, about 94% of this spend is with companies that have a presence in Australia and about 6% of this spend is with companies based outside Australia including the United States, United Kingdom, Netherlands, France and India. The top three categories of Accenture Australia's procurement spend are:

- Contractors (including the use of contingent labour and other service providers),
- Technology, and
- Workplace services.

Both Accenture UK and Accenture Australia receive services (such as technology, digital and business process services) from other members of the Accenture global group, including from Accenture's service delivery centres in Europe, Asia Pacific and South America.

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4. In this statement, an 'Accenture supplier' means a third-party supplier with whom Accenture has a direct and enduring contractual relationship through our Procurement function (excluding Accenture group companies).



## Risk of modern slavery in our supply chains

Our long-standing commitment to supporting and respecting human rights includes the elimination of modern slavery in our supply chains. We assess our overall risk profile in relation to Accenture suppliers by referencing several factors, including the geographic location of the Accenture supplier and the industry in which it operates.

Given the nature of our business and supply chains, and the risk assessments we have undertaken to date, we believe the risk of modern slavery, child labour and human trafficking in our supply chains is low. But we are not complacent and keep under review how we can improve and evolve in response to changing circumstances and the evolution of our business.

In the context of an overall low risk of modern slavery in our supply chains, the procurement categories that present potentially higher levels of risks due to the prevalence of low-paid and migrant workers within these industry sectors and potential use of conflict minerals, are:

- Technology;<sup>5</sup> and
- Workplace services.<sup>6</sup>

While travel and hospitality have continued to be curtailed as a result of COVID-19, as and when such restrictions ease, such costs (particularly with airlines, hotels and other travel services providers) are an area of potential risk for Accenture that we plan to examine further in coming years.

## Our actions

The actions that Accenture takes to reduce the risk of modern slavery in its operations and supply chains are driven by our due diligence and monitoring strategy and are operationalised through the processes that we have put in place and as further described below.

### **Our supply chain due diligence and monitoring strategy**

We are committed to doing business ethically and legally, and we seek to leverage our global buying power to advance human rights. Accenture seeks to undertake appropriate human rights diligence, including in relation to modern slavery, in accordance with the requirements of applicable laws and our commitments under the UNGC and the UN Guiding Principles on Business and Human Rights. Given the scale and diversity of our business, we prioritise supply chain due diligence efforts with a focus on those areas that are:

- Most relevant to our own priorities,
- Where we can most effectively and appropriately exert leverage, and/or
- Of heightened concern and in relation to higher risk geographies.

We recognise the importance of assessing potential risks to rights-holders as well as to Accenture. As our operating context evolves at pace, we also recognise the need to continuously adapt our human rights due diligence strategies (e.g., in relation to responsible mineral sourcing). We continue to incorporate human rights due diligence within many of our broader enterprise risk management systems and legal compliance processes, and at different stages of the supply life cycle.

5. Per global specialist firm FRDM analysis, higher-risk suppliers in this category include computer terminal and peripheral equipment (including telecom equipment), electronics, audio and video equipment.

6. Per FRDM analysis, higher-risk suppliers in this category include cookie and cracker manufacturing, coffee and tea (hospitality and catering).

### **Our supply chain due diligence and monitoring processes**

We are actively working to improve our visibility into the number of suppliers reporting their sustainability performance—for example, the number of our suppliers who report emissions reduction targets. In fiscal 2021, we began to roll out Accenture’s new blockchain-enabled global Sustainable Procurement Hub and its platform, the Accenture True Supplier Marketplace, to help us better qualify and onboard Accenture suppliers. Our new Supplier Sustainability Assessment (which forms part of our Sustainable Procurement Hub) aims to streamline the process of collecting ESG data (including in relation to human rights), while improving user experience. It centralises data in a single location, enabling responsible buying while driving transparency.

We believe the relationship between Accenture and our suppliers is an important component to achieving our objectives in this arena. Our Accenture Supplier Standards of Conduct, which supplements our COBE, sets out the legal and ethical standards (including in relation to human rights) that Accenture suppliers are required to uphold or to which they must make an equivalent commitment. In turn, Accenture expects our suppliers to apply our Supplier Standards of Conduct to their own suppliers.

### **Our Sustainable Procurement Hub**

To date, of the approximately 2,400 Accenture suppliers onboarded through the Supplier Hub, over 98% have agreed to commit to our Supplier Standards of Conduct.

Following a successful pilot in the United Kingdom and Ireland, the Sustainable Procurement Hub has now been extended to Australia and New Zealand and the global rollout is set to continue throughout fiscal 2022.

### **Responsible sourcing of minerals**

In fiscal 2021, we engaged a specialist third-party provider to assist us in carrying out the enhanced due diligence required in relation to that part of our Industry X supply chain where we are sourcing products containing tin, tungsten, tantalum or gold (3TG minerals). Given the recent evolution of part of our business into hardware manufacturing, this will now be a key component of our global strategy to address modern slavery in our supply chain.

### **Pilot Supplier Audit Programme (UK)**

As part of a holistic review of our supplier risk management strategy, in fiscal 2021, we started to implement enhancements around our auditing and ongoing monitoring of existing Accenture suppliers.

In fiscal 2021, we assessed the practices of Accenture suppliers in the United Kingdom in relation to our Supplier Standards of Conduct (including modern slavery and other relevant human rights). A key focus was placed on identifying continual improvement opportunities. Given the COVID-19 landscape, physical onsite reviews were not possible, and a virtual assessment approach was adopted, supported

by a third-party ethical auditor. We found no instances of non-conformance with our Supplier Standards of Conduct, and where opportunities for improvement were identified, we have notified the suppliers of the improvements required.

We plan to extend this audit approach to other geographies in fiscal 2022, and to commence in-person audits once COVID-19 restrictions allow.

### **Assessing effectiveness**

Separately, we continue to work with a specialist global firm—FRDM—to provide a continuous monitoring service that provides insight into our suppliers and their industries to assess them against six key indices: child labour, decent wages, forced labour, migrant workers, modern slavery and trafficking in persons. We continue to track our Accenture suppliers in the United Kingdom and Australia using this third-party monitoring. If there was a credible report of supplier engagement in modern slavery, Accenture would be notified.

### **Living wage**

Accenture UK is an accredited 'real Living Wage' employer.<sup>7</sup> We therefore require Accenture suppliers to pay the real Living Wage to UK employees providing services to us, and before we engage any new Accenture supplier we take steps to verify that they meet this requirement.

Accenture continues our efforts to drive the adoption of living wages with all our suppliers around the world. We have set an expectation in our global Supplier Standards of Conduct, and strongly encourage all our suppliers to pay a living wage or higher to their people who directly provide services to Accenture and/or our clients.

We have a regular review process in place to validate living wages in the local country context and help ensure we pay 100% of our people a living wage or more, which is above the legally required minimum wage in those countries.

This approach is also applied to Accenture UK's Corporate Citizenship grant awards, ensuring our community impact partners are encouraged to be real Living Wage employers and that people helping to deliver our outreach programmes are paid a real Living Wage.

## **Our training and advocacy on modern slavery**


### **Training for our people**

We continue to provide training on slavery and human trafficking to our global Accenture Procurement team and in fiscal 2021 we trained 100% of our people in both our UK Procurement team and our Australia Procurement team, along with key members of our global Procurement teams responsible for sourcing and contracting with Accenture suppliers, members of our Legal teams, and other stakeholders to raise awareness of this topic more broadly in the business.

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7. In this statement, the 'real Living Wage' refers (for the UK) to the living wages as determined by the Living Wage Foundation. For Ireland, it refers to the living wage as determined by the Living Wage Technical Group. For all other jurisdictions, it means a wage that is higher than the legal minimum wage requirement and will take into account relevant actual living costs.





We are also proud that in 2020 Accenture employees formed a Human Trafficking Eradication Community of Practice, which now has over 400 members around the world. The aim of this Community of Practice is to share best practices across the company to support the fight to eradicate human trafficking. The Community is led by an executive steering committee made up of 17 senior leaders from across Accenture. As part of this endeavour, the Community is piloting [OnWatch](#) online training at Accenture.

OnWatch is a survivor-led training designed to empower individuals to spot, report and prevent sex trafficking where they live, work and play. Through true survivor experiences, industry experts explain the key indicators of trafficking, as well as how individuals can support a survivor's path to freedom. This training is available publicly, and employees are encouraged to share the OnWatch training link with friends and family.

### **Advocacy and collaboration within our ecosystem**

Accenture is committed to advocating awareness of modern slavery within our global ecosystem of Accenture suppliers, and we are also committed to encouraging collaboration and the promotion of best practices to address potential risks. For instance, as part of our broader responsible business programme, we encourage all of our UK social impact grant recipients to review their operations for modern slavery.

As a UNGC signatory, we work toward implementing the Blueprint for Corporate Sustainability Leadership, sharing related outcomes and learnings with Global Compact member organisations. Our commitment includes sharing best practices with the UNGC's UK Network's Modern Slavery Working Group to help support the elimination of slavery and human trafficking.

## **Looking ahead**

We continue to review our human rights efforts, as well as best practices in the marketplace, to understand how we can further strengthen our commitments.

We continue to invest in new technology and processes to help us have greater visibility of ESG performance of our suppliers. We are proud of our Sustainable Procurement Hub, which we are rolling out globally. This new technology platform will enhance or provide greater transparency from our direct suppliers about their own human rights policies, due diligence and practices at the point at which Accenture makes buyer selection decisions, onboarding or ad hoc ESG assessments. The global rollout is set to continue throughout fiscal 2022.

## Companies covered by this report

Accenture's business and supply chains are truly global. As our strategy in this arena continues to evolve around the world, we have therefore decided that we should now publish a single consolidated Modern Slavery Transparency Statement setting out the steps that the Accenture group of companies ('Accenture') has taken during its financial year and 'modern slavery reporting period' ending on 31 August 2021 (fiscal 2021) to ensure that modern slavery is not taking place in any of our supply chains or in any part of our own business. While our focus was originally driven out of the United Kingdom, and later Australia, we have already examined work practices and supply chains in a number of other countries where we assessed the risks to be greatest (for example, our Indian delivery centres), our agency workers around the world and our workplace services in the Middle East.

This joint statement is therefore made by Accenture UK in accordance with the requirements of section 54(2) of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015 in the UK, and by Accenture Australia in accordance with the requirements of section 14 of the Modern Slavery Act 2018 (Cth) in Australia, and sets out the steps Accenture is taking to ensure that slavery and human trafficking are not taking place in any of our supply chains or in any part of our own business.

This statement specifically covers the following UK and Australian entities, each being required to report under one or both of the Acts above:

- Accenture (UK) Limited (registered number 4757301), registered in England and Wales with registered address at 30 Fenchurch Street, London EC3M 3BD, England
- Karmarama Limited (registered number 03495324) registered in England and Wales with registered address at 30 Fenchurch Street, London EC3M 3BD, England
- Accenture Australia Pty Ltd (ABN 49 096 776 895) having its registered offices at 3 Sussex Street Barangaroo, Sydney, NSW 2000, and which is Accenture's main Australian operating entity
- Accenture Australia Holdings Pty Ltd (ABN 61 096 995 649) having its registered offices at 3 Sussex Street Barangaroo, Sydney, NSW 2000

Accenture Australia Holdings Pty Ltd is the parent of Accenture Australia Pty Ltd and a large number of other Accenture related Australian corporations, which together form the Accenture business in Australia.

All entities listed above are a part of the global Accenture group of companies, which are ultimately owned by Accenture plc, incorporated in Ireland and listed on the NYSE.

## Governance

In the United Kingdom, David Sawyer is our Modern Slavery Act Officer, and he continues to lead our compliance with the UK Modern Slavery Act. David is an Accenture Managing Director with responsibility for geographic operations in the United Kingdom and Ireland; his responsibilities include workplace safety, procurement and corporate citizenship.

In Australia, Ron Harris is our Modern Slavery Act Officer, and he continues to lead our compliance with the Australian Modern Slavery Act. Ron is an Accenture Managing Director, and a director of Accenture Australia Pty Ltd and Accenture Australia Holdings Pty Ltd; he is responsible for our geographic operations in Australia and New Zealand.

## Consultation

The same policies, practices and procedures regarding responsible business, ethics and compliance apply to the affiliates in our corporate group at a global and local level. We have communicated with each of the relevant entities that we own and control regarding this statement and our approach to modern slavery, noting they are subject to the same policies and processes as set out in this statement.

The board of directors of each of the companies listed above has approved this statement to be signed on their behalf by a director and has confirmed that the information in this statement is accurate as at that date.

Signed for and on behalf of Accenture Australia Pty Ltd



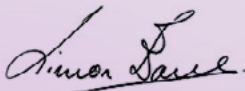
**Pete Burns, Director** | 23rd February 2022

Signed for and on behalf of Accenture Australia Holdings Pty Ltd



**Pete Burns, Director** | 23rd February 2022

Signed for and on behalf of Accenture (UK) Limited



**Simon Eaves, Director** | 24th February 2022

Signed for and on behalf of Karmarama Limited



**Derek Simpson, Director** | 25th February 2022

## Further information

For more information about Accenture's human rights agenda generally and how we adhere to our obligations under the UNGC, please see our latest [UNGC Communication on Progress](#).

Our Modern Slavery Act Transparency Statements for the United Kingdom from [2019](#), [2020](#) and [2021](#), and [Australia 2021](#) are also available.

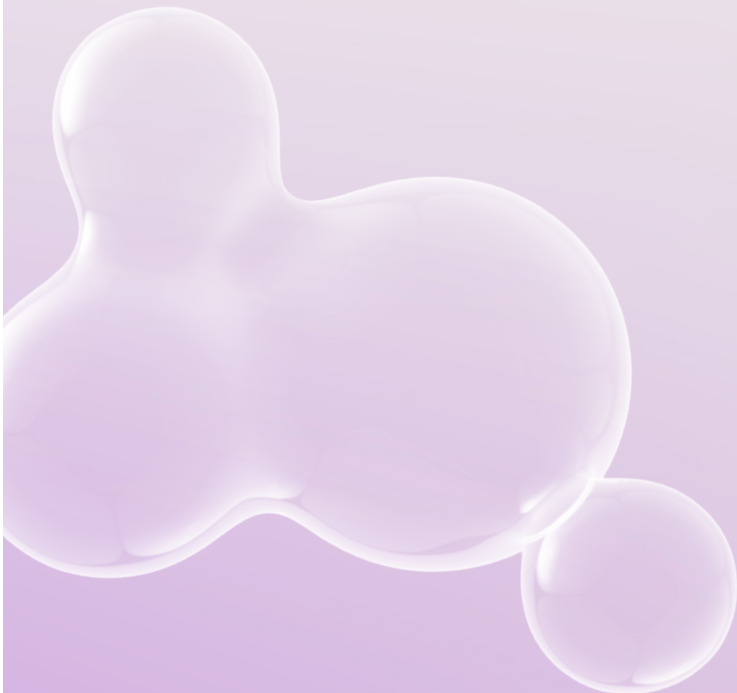
## Raising concerns

If you have any questions about this statement, or any concerns about slavery or human trafficking within Accenture's supply chains or organisation, please contact the Accenture Business Ethics Helpline:

- You can call the Accenture Business Ethics Helpline globally at +1 312 737 8262, or in India at +1 888 276 6226 with access code 000-117. It is available 24 hours a day, seven days a week (you can reverse the charges), or
- You can report your concern via the [Accenture Business Ethics Helpline website](#)

You can raise concerns anonymously if you prefer. Accenture treats all concerns raised seriously and in strict confidence.

Accenture prohibits and will not tolerate retaliation against any employee who comes forward to raise, in good faith, a concern about modern slavery or who assists us, or a law enforcement authority, by providing information to address such a concern.





## About Accenture

Accenture is a global professional services company with leading capabilities in digital, cloud and security. Combining unmatched experience and specialised skills across more than 40 industries, we offer Strategy and Consulting, Interactive, Technology and Operations services—all powered by the world's largest network of Advanced Technology and Intelligent Operations centers. Our 674,000 people deliver on the promise of technology and human ingenuity every day, serving clients in more than 120 countries. We embrace the power of change to create value and shared success for our clients, people, shareholders, partners and communities.

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